

**THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

CASE NO. 03-22261-JAD

ROBERT M. BOLLMAN and KELLY A.
BOLLMAN,
Debtor(s).

Chapter 13

BRAD JOHNSON,
Movant/Applicant,
vs
RONDA J. WINNECOUR, TRUSTEE;
OFFICE OF THE UNITED STATES
TRUSTEE, U.S. ATTORNEY, and
ROBERT M. BOLLMAN and KELLY A.
BOLLMAN,
Respondent(s).

MOTION FOR DISTRIBUTION OF UNCLAIMED FUNDS
PURSUANT TO 28 U.S.C. §2042

AND NOW comes BRAD JOHNSON ("Applicant"), by and through the undersigned counsel, and files this MOTION FOR DISTRIBUTION OF UNCLAIMED FUNDS, whereof the following is a statement:

1. Upon information and belief, there is on deposit with the Clerk of the U.S. Bankruptcy Court for the Western District of Pennsylvania the sum of \$5,546.27 in funds intended to be distributed to the Applicant in the above case, which has not yet been claimed (the "Unclaimed Funds"). See Record of Funds Received for Deposit at Doc. No. 82. The address used by the Chapter 13 Trustee for purposes of the distribution, according to that record, was 11841 Haywood Road, N. Huntingdon, PA 15642.

2. Applicant states that it is entitled to said Unclaimed Funds and that Financial Resources Group, Inc., is authorized by it to receive these funds. See attached Affidavit and Limited

Power of Attorney attached hereto collectively as Exhibit "A." Applicant further avers:

- A. He filed Claim No. 14 on 09/15/2003 for which the indicated address was c/o Ronald W. Anderson, Esquire, 434 Main Street, P.O. Box 373, Irwin, PA 15642. The Claim amount was in the amount of \$8,222.78..
 - B. The Claim remains due and outstanding and unpaid in an amount greater than the amount of the unclaimed funds sought in this MOTION.
 - C. Applicant has not assigned or transferred any right or interest in the Claim (or the unclaimed funds which are the subject of this Application).
 - D. Applicant does not know why the funds are indicated as having been returned. The check was received at the 11841 Haywood Road, N. Huntingdon, PA 15642 address (which was his ex-wife's address), but was never cashed as Applicant did not know that the check had been received.
3. By agreement between Applicant and The Financial Resources Group, Inc., as set forth in the attached Affidavit and Limited Power of Attorney (at Exhibit "A") the funds are to be distributed to Applicant in the care of The Financial Resources Group, Inc., so that said entity may deduct from same its agreed upon fees for the prosecution of this Motion before distributing to Applicant the balance.

WHEREFORE, it is respectfully requested that this Honorable Court grant this Motion as set forth in the proposed Order attached hereto and incorporated herein.

Respectfully Submitted:

Date: December 16, 2009

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